UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNIVERSITAS EDUCATION, LLC,

Petitioner,

v.

NOVA GROUP, INC, as trustee, sponsor, and fiduciary of THE CHARTER OAK TRUST WELFARE BENEFIT PLAN, et al.

Respondents.

NOVA GROUP, INC, as trustee, sponsor, and fiduciary of THE CHARTER OAK TRUST WELFARE BENEFIT PLAN, et al.

Petitioner,

v.

UNIVERSITAS EDUCATION, LLC, et al.

Respondents.

No.: 1:11-cv-1590-LTS-HBP

Hon. Laura Taylor Swain

NOTICE OF MOTION

No.: 1:11-cv-8726-LTS-HBP

PLEASE TAKE NOTICE that, relying on the accompanying Memorandum of Law, dated April 20, 2021, and the accompanying Declaration of Roger L. Stavis, Esq., dated April 20, 2021, and all the pleadings and prior proceedings had in this matter, Mintz and Gold LLP ("M&G") as counsel for Grist Mill Capital, LLC ("GMC"), will move this Court, before the Honorable Laura Taylor Swain, at the United States District Court, Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007 for an order granting M&G's request for leave to withdraw as counsel to GMC.

M&G respectfully requests that this Court grant this Motion, as well as such other and further relief as the Court deems just and proper.

New York, New York Dated:

April 20, 2021

Respectfully submitted,

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All Counsel of Record (via ECF) To:

> **Daniel Carpenter** Principal of Grist Mill Capital, LLC (via ECF and first-class mail)